



February 11, 2009

Manisha Singh  
Lead, Policy and Regulatory WG  
California Air Resources Board  
1001 I Street  
Sacramento, California 95812

VIA ELECTRONIC MAIL: [mansingh@arb.ca.gov](mailto:mansingh@arb.ca.gov)

RE: Draft Low Carbon Fuel Standard (LCFS) Regulation – January workshop

Dear Ms. Singh:

Darling International Inc. ("Darling" ) is submitting comments on the draft LCFS regulation as discussed at the January 30, 2009 workshop and to encourage an accelerated timeline for Biodiesel and other diesel alternatives.

Darling is the largest and the only publicly traded independent rendering company in the United States. Rendering companies such as Darling recycle meat and slaughter byproducts and used cooking oil from the restaurant and fast food industry. The rendering industry recycles more than 54 billion pounds of such materials in the United States each year to produce animal fats, recycled cooking oil and animal proteins that are used as animal feed ingredients, by the oleo-chemical industry and to make biofuel. In California, Darling and other rendering companies in the state annually recycle more than 2.3 billions pounds of meat byproducts and grease that would otherwise be difficult to dispose of without damaging the environment or endangering human and animal health.

Darling was established in the year 1882, making the company more than 126 years old, and operates rendering and restaurant grease recycling facilities across the United States. In California, Darling operates recycling facilities in San Francisco, Los Angeles, Fresno and Turlock. Darling also has collection stations in San Diego and Santa Ana.

The animal fats and recycled cooking oil that Darling produces have been long recognized as potential feedstocks to make biodiesel. Recently, the City of San Francisco announced its support for Darling's proposal to construct a 10,000,000 gallon per year biodiesel plant adjacent to its rendering plant located in the port of San Francisco. The plant will utilize recycled cooking oil and animal fats of California origin as feedstock for its biodiesel. The plant is in final permitting and, assuming no major issues, should be operational in 2010.

Darling appreciates the change made in the implementation timeline from the December workshop to begin implementation in 2011 but requests that more be done. According to the California Energy Commission, California is using 43+million gallons of Biodiesel per year. California has nine Biodiesel plants operating, with an estimated total production capacity of 63 million gallons per year; another 4 plants are idle and at least one is under construction. The existing infrastructure is more than capable of meeting the demands of a one percent reduction in carbon intensity beginning January 2010. Furthermore, according to the California Energy Commission, the current AB 118 investment plan will allocate funding towards the development of biodiesel blending and distribution infrastructure. Darling strongly recommends that ARB revises the implementation timeline for the diesel fuel pool to include more aggressive decreases in carbon beginning in 2010.

Thank you for your consideration of these comments. Should you have any questions or need additional information please contact me at 1-800-800-4841 or rhamilton@darlingii.com.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Ross Hamilton". The signature is fluid and cursive, with a large, stylized "C" at the beginning and a long, sweeping line extending from the end.

C. Ross Hamilton, Ph. D.  
Director Government Affairs & Technology